

**UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF OKLAHOMA**

MICHAEL CHRISTOPHER,

Plaintiff,

Case No.: 5:19-CV-00806-G

v.

EQUIFAX INFORMATION SERVICES,

Defendant.

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**DECLARATION OF JESSICA N. SPURLOCK IN SUPPORT OF EQUIFAX'S  
OPPOSITION TO MOTION FOR JUDGMENT BY DEFAULT**

I, Jessica Spurlock, hereby declare, as follows:

1. I am over the age of 21 years and am otherwise competent to provide this declaration.
2. I am employed by Equifax Inc. ("Equifax") as a Litigation Paralegal Manager.
3. I have personal knowledge of the matters described herein based upon my personal experiences as an employee of Equifax and upon my review of records maintained by Equifax in the ordinary course of its business as a consumer reporting agency.
4. I am authorized to provide this declaration in support of Equifax Information Services LLC's Opposition to Plaintiff's Motion for Judgment by Default.
5. Equifax has confirmed that Plaintiff's summons and Complaint were delivered to Equifax Information Services LLC, PO Box 740241, Atlanta, Georgia 30374 on October 5, 2019. PO Box 740241 was the address written by Plaintiff on the summons form.
6. PO Box 740241 is not the proper address for service of process on Equifax

Information Services LLC. Rather, this address is associated with Equifax's Disclosure Department, and is used to receive correspondence regarding credit files and related disputes lodged by consumers. It is not used for litigation and is not monitored by an Equifax officer, managing or general agent, or any other agent or employee authorized by law to receive service of process. PO Box 740241 is not Equifax Information Services LLC's principal place of business.

7. Mailing addresses for Equifax Information Services LLC's registered agent for service of process and principal place of business are publicly available through the Georgia Secretary of State.

8. Once delivered to PO Box 740241, Plaintiffs' mailing was not identified as a lawsuit that should be re-routed to the Equifax legal department. As with other correspondence of the type for which PO Box 740241 exists, Equifax appears to have responded to Plaintiff's mailing via a form letter dated October 17, 2019, which letter requested additional identification information after Equifax was unable to locate Plaintiff's credit file.

9. As a result, Equifax did not become aware of this lawsuit until receipt of Plaintiff's Motion for Judgment by Default.

10. Equifax promptly investigated the method of service for this lawsuit and engaged outside counsel to oppose Plaintiff's Motion for Judgment by Default.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 20th day of December 2019, at Atlanta, Georgia.

By: 

Jessica N. Spurlock